

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS SOBER HOUSING
CORPORATION,

Plaintiff

v.

CITY OF CHELSEA, JAY ASH, in his capacity
as City Manager of the City of Chelsea,
JOSEPH COONEY, in his capacity as Director
of the Department of Inspectional Services of
the City of Chelsea, and JOSEPH SIEWKO,
in his capacity as Fire Chief of the City of
Chelsea,

Defendants

Civil Action No.

04cv10753 JLT

PLAINTIFF'S APPLICATION FOR PRELIMINARY INJUNCTION

For the reasons stated in the Verified Complaint, and Memorandum of Law, filed herewith, plaintiff Massachusetts Sober Housing Corporation moves that the Court issue a preliminary injunction against all defendants requiring them to:

1. Issue forthwith a Certificate of Occupancy allowing ten male veterans in recovery from alcoholism and/or drug addiction to take up residence at the house at 68 Hooper Street, Chelsea, Massachusetts;
2. Treat said house as a single family residence for zoning, building code, sanitary code, fire safety, and all other purposes.

3. Cease and desist from interfering with or obstructing the quiet enjoyment of the use by the residents of said house as an Oxford House.
4. Comply with such other orders as the Court deems appropriate.

Dated: April 13, 2004

MASSACHUSETTS SOBER HOUSING
CORPORATION

By its attorney,

A handwritten signature in black ink, appearing to read 'Bruce T. Macdonald', is written over the printed name.

Bruce T. Macdonald
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